

Exhibit Q

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KIMBERLEE WILLIAMS, *et al.*

Plaintiffs,

vs.

BASF CATALYSTS LLC, *et al.*

Defendants.

No. 2:11-cv-01754 (ES) (JAD)

CIVIL ACTION

**DECLARATION OF SHEILA WARE IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, Sheila Ware, pursuant to 28 USCS § 1746, declare as follows:

1. My name is Sheila Ware. I am over twenty-one years of age and am fully competent to make the statements contained in this declaration.

2. I am currently one of the named plaintiffs in the above-captioned proposed class action (the "Action") as the personal representative of Ralph Ware, deceased, and Donna Ware, deceased. Donna Ware while alive commenced the Action. I submit this declaration in support of the preliminary approval of the Settlement Agreement reached in the Action as well as the application for conditional certification of a settlement class and preliminary approval of the proposed Plan of Distribution in connection with implementing the Settlement.

3. I am the successor personal representative of the Estates of Ralph Ware, deceased and Donna Ware, deceased, who were husband and wife. Ralph Ware died on December 12, 2001 from mesothelioma. Donna Ware died on January 7, 2017. I was married to the late Randall Ware who was a nephew of Ralph Ware. My husband Randall Ware was heir to both the Estates of Ralph

Ware and Donna Ware. Upon Randall's death on June 17, 2017 I became the successor personal representatives of the Estates of Ralph Ware and Donna Ware. In such capacity I took over my aunt Donna Ware's role as one of the class representatives in the Action, and since that time have participated as an active plaintiff in the case.

4. I am, and have been, represented in the Action principally by the attorneys with the law firm of Cohen, Placitella & Roth PC firm (CPR), who, along with another law firm that over the course of the litigation was associated with them, have diligently prosecuted the Action.

5. Since taking over my late aunt Donna Ware's role as plaintiff in the Action, I have been actively involved in all phases of this lawsuit against the Defendants, including my review of and providing information and documents for court filings, my review of and providing of information and documents for discovery, and my preparation for and attendance at my deposition. In particular, I have responded to five sets of interrogatories, five sets of requests for documents, and two sets of requests for admissions. I was deposed in the Action on April 17, 2018. My attorneys at CPR have kept me fully informed of the various activities that have occurred in this lawsuit through in person meetings, correspondence phone calls and copies of pleadings and orders. They have sought my input on many occasions, including my assent to the proposed settlement. I believe that I am fully up to date on the status of the case and have no questions that have not been answered.

6. The Settlement Agreement, Plan of Distribution and related settlement papers have been reviewed and explained to me by my attorneys and I believe I understand the proposed

settlement and how it will be distributed among Class members.

7. I believe that the proposed settlement is fair, reasonable and adequate, and should be approved by the Court.

8. I understand my duties as a class representative and will continue to act in the best interests of the Class and to actively participate in this case.

9. I have no claim or interest that is adverse to other class members

10. I am aware that the Settlement Agreement contains a provision for a request to be made to the Court to award a class representative service fee to me as well as to the other class representatives. Throughout this case, I have not received nor been promised any form of compensation, directly or indirectly, for prosecuting, serving as a representative party in, or settling this class action in which I am a named plaintiff. My acceptance and support of the Settlement is not in any way conditioned upon my receipt of an award for serving as a representative of the Class.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 2nd day of January 2020.


SHEILA WARE